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Staff Co	onsulte	ed	:																																
Name(s Review	•																					D	ate												
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Questio A. <u>FIN</u> 1.		ΑI	L]	M	A	N	ΙA	١G	Έl	M	Œ	NΊ	ΓS	SY	ST.	EN	M																		
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	b. Based upon a selected or random sample, are expenditures supported by		
	invoices, contracts, or purchase orders, etc.?	Yes	 No
	[24 CFR 570.502(a)(4)]	res	NO
	Describe Basis for Conclusion:		
	Describe Basis for Conclusion.		
3.			
۶.	Tethan accounting another is an a such hasis on the management and in our anomaly		
	If the accounting system is on a cash basis, can the program participant suppor		
	accrual data in the Consolidated Performance and Evaluation Report (CAPER)	Yes	No
	or other quarterly, semi-annual, annual, or other applicable report(s) from		
	documentation on hand?		
	[24 CFR 570.502(a)(4)]		
	Describe Basis for Conclusion:		
4.			
	If the accounting system provides for accrual of expenditures, does the	$\overline{}$	
	information reported to HUD reconcile with accounting records?		
	·	es No	N/A
	[24 CFR 570.502(a)(4)]		
	Describe Basis for Conclusion:		

5.			
	Does the program participant identify expenditures with respect to the grant		
	program?	Yes	No
	[24 CFR 570.502(a)(4)]		
	Describe Basis for Conclusion:		
6.			
0.	Does the program participant identify expenditures by specific grant?	П	
	Note : The HUD-Administered Small Cities program in New York and Insular		
	area grants prior to FY 2005 are tracked by specific grant.	Yes	No
	[24 CFR 570.502(a)(4)]	I	
	Describe Basis for Conclusion:		
	_ 454126		
7.			
	a. Does the program participant identify expenditures in its accounting records		
	according to eligible activity classifications specified in the statute,	Yes	No
	regulations, or grant agreement that clearly identify the use of program	1	
	funds for eligible activities?	ı	
	[24 CFR 570.502(a)(4)]	L	
	Describe Basis for Conclusion:		

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	b. Did the record review indicate any instances of ineligible expenditures?		
		Yes	No
	Describe Basis for Conclusion:		
8.			
	Do accounting records include unexpended/unobligated balances?		
	[24 CFR 570.502 (a)(4)]		
	[24 CTK 370.302 (a)(4)]	Yes	No
	Describe Basis for Conclusion:\	_ !	
	Describe Dasis for Concrusion.		
B. <u>A</u>	<u>ADVANCES</u>		
9.			
	If the program participant requests funds in advance, does the participant	1 🖂	
	minimize the time elapsed between the transfer of funds from the U.S.	J LJ	
		s No	N/A
	Treasury and disbursement by the participant?		
	[24 CFR 570.502(a)(5)]		
	Describe Basis for Conclusion:		

10.					
	pa: tra	the program participant advances grant funds to subrecipients, does the rticipant have procedures to minimize the time elapsed between the ansfer of funds to, and disbursement by, the subrecipients? 4 CFR 570.502(a)(5)]	Yes	No	N/A
	De	escribe Basis for Conclusion:			
C. 11.	SF	2-272, FEDERAL CASH TRANSACTIONS REPORT			
	a.	Has the program participant is required to submit the SF-272, has the participant submitted timely and complete reports for the last 3 reporting periods? [24 CFR 570.502 (a)(15)]		Yes	No
	De	escribe Basis for Conclusion:			
	b.	In its review of these reports, has HUD identified any problems where cas advances have been received and held in excess of three days?	h	Yes	No
	De	escribe Basis for Conclusion:		165	INO

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explanations of actions taken to reduce excess balances of cash advances, has the program participant provided such justification? [24 CFR 570.502(a)(15)] Describe Basis for Conclusion:	Yes	No	N/A
d. If HUD has required the program participant to provide narrative		$\overline{\Box}$	
explanations of actions taken to reduce excess balances of cash advances		<u></u>	
provided to subrecipients, has the program participant provided such	Yes	No	N/A
justification? [24 CFR 570.502(a)(15)]			
Describe Basis for Conclusion:	<u> </u>		
If grant advances are deposited into an interest-bearing account, what			
provisions have been made for return of interest income to HUD?		Ш	
	Yes	No	N/A
[24 CFR 570.502(a)(5)]			
[24 CFR 570.502(a)(5)] Describe Basis for Conclusion:			

D. <u>INTERNAL CONTROLS</u> (Reference for some of the questions: GAO/AIMD-98-21.2.1, "Framework for Federal Financial Management System Checklist," May 1998) 13. a. Does the program participant have an organization chart that sets forth the actual lines of responsibility? Yes No **Describe Basis for Conclusion:** b. Are duties for key employees of the program participant defined? Yes **Describe Basis for Conclusion:** c. Has the program participant obtained fidelity bond coverage for responsible officials? Yes No **Describe Basis for Conclusion:** d. Does the program participant's chart of accounts include a complete listing of the account numbers used to support the control needed to ensure that Yes No resources used do not exceed resources authorized? **Describe Basis for Conclusion:**

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e.	Does the program participant's approval controls provide reasonable assurance that appropriate individuals approve recorded transactions in accordance with management's general or specific criteria?	Yes	No
De	escribe Basis for Conclusion:		
f.	Does the program participant's controls over the design and use of documents and records provide reasonable assurance that transactions and events are properly documented, recorded, and auditable?	Yes	No
De	escribe Basis for Conclusion:		
g. De	Does the program participant's segregation of duties controls effectively reduce the opportunity for someone to perpetrate or conceal errors or irregularities in the normal course of duties? escribe Basis for Conclusion:	Yes	No
h.	Is it clear that all personnel are responsible for communicating upward the program participant's operating problems and noncompliance with laws and regulations?	Yes	No
De	escribe Basis for Conclusion:		

	i.	Does the program participant's internal control procedures support its ability to prepare financial statements that are fairly presented in conformity with generally accepted or other relevant and appropriate accounting principles and regulatory requirements? (One level of assurance of the accuracy and integrity of data is provided by the attainment of an unqualified opinion on the audited annual financial statements and internal controls.)
	De	escribe Basis for Conclusion:
E. 14.	AC	CCURACY OF REPORT INFORMATION
		How does the program participant demonstrate that its systems and/or procedures ensure that accurate information is collected and reported to HUD and that such systems and/or procedures comply with Federal policies and requirements governing reporting?
	De	escribe Basis for Conclusion:
	b.	Does the financial information (e.g., drawdowns, unexpended balances) recorded in HUD's financial management systems (e.g., LOCCS, IDIS) match the official accounting records of the program participant for the period covered by the last CPD-required performance report? [24 CFR 570.507, 24 CFR 91.520]
	De	escribe Basis for Conclusion:

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	c. Does the program income information in the program participant's official accounting records for the period covered by the most recently-completed performance report match the performance report information? [24 CFR 570.504, 24 CFR 570.507, 24 CFR 91.520]	Yes	No
	Describe Basis for Conclusion:		
F. 15.	PROGRAM INCOME		
	Are revenue-generating activities (e.g., rehabilitation, economic development loans) being undertaken?	Yes	No
	Describe Basis for Conclusion:		
16.	If revenue-generating activities are being undertaken, has the program		
	participant established revenue accounts to record program income? [24 CFR 570.502(a)(4)] Pescribe Basis for Conclusion:	No	N/A
	Describe dasis for Conclusion:		

17.				
	If the program participant has an activity generating program income that is only partially Federally-assisted, does the participant have a system for ensuring that the program income is properly prorated to reflect the percentage of Federal program funds used?	Yes	No	N/A
	Describe Basis for Conclusion:			
18.				
	Has the program participant disbursed program income (other than program income deposited in a revolving funds) in payment of program costs prior to making further cash withdrawals from the U.S. Treasury? [24 CFR 570.502(a)(5), 24 CFR 570.504(b)]	Yes	No	N/A
	Describe Basis for Conclusion:			
19.				
	 a. Does the program participant have a system for tracking program income generated by subrecipients or other entities to which funds are passed through? [24 CFR 570.502(a)(4)] 	Yes	No	N/A
	Describe Basis for Conclusion:			

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on expiration of any agreements between the program participant and e subrecipient and/or pass-through entity, does the participant have a stem for ensuring: the timely and accurate transfer of any funds to be returned to the participant; and/or the timely and accurate transfer of outstanding loans or accounts receivable? ibe Basis for Conclusion:	Yes	No	N/A
on expiration of any agreements between the program participant and e subrecipient and/or pass-through entity, does the participant have a stem for ensuring: the timely and accurate transfer of any funds to be returned to the participant; and/or the timely and accurate transfer of outstanding loans or accounts receivable?	Yes	No No	 N/#
e subrecipient and/or pass-through entity, does the participant have a stem for ensuring: the timely and accurate transfer of any funds to be returned to the participant; and/or the timely and accurate transfer of outstanding loans or accounts receivable?	Yes	No	N/
the timely and accurate transfer of any funds to be returned to the participant; and/or the timely and accurate transfer of outstanding loans or accounts receivable?	Yes	No	N/1
the timely and accurate transfer of outstanding loans or accounts receivable?			
	<u> </u>		
		• • •	
ibe Basis for Conclusion:			
7	porting on the use of, program income in the Integrated Disbursements stem?	porting on the use of, program income in the Integrated Disbursements and I stem?	

	inc am	ne program participant received unexpected amounts of program come during its program year, did it follow the required procedures for lending or revising its Action Plan? 4 CFR 570.302	Yes	No	N/A
		be Basis for Conclusion:			
21.	Loan	Servicing			
	servici	program participant provides loans, does it have a system for properly ng all CDBG-assisted loans (including deferred payment loans and ing loan funds) that includes: written loan agreements that clearly describe the repayment terms, what constitutes a default and how it can be cured, what actions the program participant will take if the default is not cured, and (if applicable) what is pledged as security for the loan?	Yes	No	N/A
	[24 CF	collection procedures that provide for the recognition of all current amounts due, payments received, notification to borrower when payments are overdue, a process for taking further action on defaulted loans, and criteria for writing off bad debts? FR 570.502(a)(4)]			
	Descri	be Basis for Conclusion:			

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G. SALARIES AND WAGES

22.				
	responsible official(s) of the governmental unit? [24 CFR 570.502(a)(4)]	es	No No	N/A
	Describe Basis for Conclusion:			
23.				
۷۵.	a. For employees working solely on the CDBG program, are charges for their salaries and wages supported by periodic certifications that the	es	No	N/A
	Describe Basis for Conclusion:			
	b. Were the certifications prepared at least semi-annually and signed by the employee or a supervisory official having first hand knowledge of the work performed by the employee? [OMB Circular A-87, Attachment B, #8(h)(3), 24 CFR 570.502(a)(4)]	es	No	N/A
	Describe Basis for Conclusion:			
H. 24.	INDIRECT COSTS			
	a. Are indirect costs charged to the program?			
	Describe Basis for Conclusion:		Yes	No
	Describe dasis for Conclusion.			

	b. If indirect costs are charged to the program, have Cost Allocation Plans and/or an Indirect Cost Rate proposal been developed in accordance with OMB Circular A-87, Attachments C and E? [24 CFR 570.502(a)]	s No	N/A
	Describe Basis for Conclusion:		
	c. Are indirect costs billed in accordance with an approved Cost Allocation Plan or Indirect Cost Rate developed pursuant to OMB Circular A-87, Attachment A, Section F? [24 CFR 570.502(a)]	s No	N/A
	Describe Basis for Conclusion:		
I. <u>N</u> 25.	MINORITY-OWNED FINANCIAL INSTITUTIONS		
	Has the program participant used minority-owned financial institutions in conjunction with the grant program? (Note : Because program participants are not required to use minority-owned financial institutions, they are encouraged to do so pursuant to 24 CFR Section 84.22(j) and 85.21(h), a "No" response to this question would NOT constitute a finding.) [24 CFR 570.502(a)(5)] Describe Basis for Conclusion:		No
	Describe basis for Conclusion:		
J. <u>I</u> 26.	LUMP SUM DRAWDOWNS		
	 a. Does the program participant draw down funds in a lump sum as permitted by the regulations? [24 CFR 570.513] 	Yes	No
	Describe Basis for Conclusion:		

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b.	Does the lump-sum agreement contain all of the required elements? [24 CFR 570.513(b)(2)]	Yes	No
De	escribe Basis for Conclusion:		
	Are the funds being used in accordance with the written agreement for the activities listed as eligible in 24 CFR 570.513? [24 CFR 570.513]	Yes	No
De	escribe Basis for Conclusion:		
	Has use of the deposited funds commenced within 45 days of the initial deposit? [24 CFR 570.513(b)(4)]	Yes	No
De	escribe Basis for Conclusion:		
	Have funds been substantially disbursed within 180 days of receipt of the deposit? [24 CFR 570.513(b)(4)] escribe Basis for Conclusion:	Yes	No

K. <u>OMB CIRCULAR A-133: AUDITS OF STATES, LOCAL GOVERNMENTS, AND NON-PROFIT ORGANIZATIONS</u>

Instructions: Program participants under many CPD programs are subject to OMB Circular A-133, which establishes audit requirements pursuant to the Single Audit Act Amendments of 1996 for states, local governments, and non-profit organizations that receive Federal aid. The Circular defines responsibilities for implementing and monitoring those requirements. Program participants that, in turn, provide Federal funds to secondary organizations are called pass-through entities. For simplification purposes, the term "subrecipient" will be used in this guide to refer to all such secondary organizations. Pass-through entities are required by OMB A-133, §____.400(d) to establish systems to oversee subrecipient compliance with A-133. This section of questions is designed to assist in determining whether the participant is in compliance with the required elements of an audits management system. An audits management review worksheet is attached to this Exhibit that can be used to help document the results from testing a sample of grants to subrecipients against the program participant's control system.

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Does the program participant (or any of its subrecipients) meet the annual expenditure threshold (\$500,000) for having a single or program-specific audit conducted? If "no," skip questions 28 through 46 and the Audit Review		No
Worksheet.		
Describe Basis for Conclusion:		

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28.				
		nat is the program participant's means of ensuring that audits are conducted to following:	meet a	ll of
 a. at the proper time? [OMB Circular A-133, §320(a)] b. by independent, qualified personnel? [OMB Circular A-133, §305] c. in a manner which meets the Comptroller General's audit standards? [OMB Circular A-133, §500] [24 CFR 570.502(a)(7)] 				
		scribe Basis for Conclusion:		
		Serioe Busis for Conclusion.		
29.				
	a.	Does the program participant's audit report include an opinion on whether the financial statements are presented fairly in all material respects in	Yes	No
		conformity with GAAP and whether the schedule of expenditures is presented fairly in all material respects?		
		OMB Circular A-133, §310(a) and 24 CFR 570.502(a)(7)] scribe Basis for Conclusion:		
	Бе	SCILUE DASIS TOT CORCIUSION.		
	h	Does the program participant's financial statements reflect its financial		
	D.	Does the program participant's financial statements reflect its financial position, results of operations or changes in net assets and, where	Yes	□ No
		appropriate, cash flows for the fiscal year? [OMB Circular A-133, §310(a) and 24 CFR 570.502(a)(7)]		
	De	scribe Basis for Conclusion:		

	CDDG Entitionion Trogram		
a.	What is the program participant's procedure for informing subrecipients of the Circular A-133 audit requirements? [24 CFR 570.502(a)(7) and 24 CFR 570.503(b)(4)]	OMB	3
De	escribe Basis for Conclusion:		
b.	Has the program participant determined if subrecipients expending \$300,000 or more in Federal awards in the fiscal year [\$500,000 or more for fiscal years ending after December 31, 2003] met the requirements of OMB Circular A-133?	Yes	No
	[OMB Circular A-133, §200 and 24 CFR 570.502(a)(7)]		
De	escribe Basis for Conclusion:		
a.	Are the financial statements of subrecipients presented fairly in all material		
	respects in conformity with generally accepted accounting principles?	Yes	No
	[OMB Circular A-133, §400(d)(4) and §500(b) and 24 CFR	103	
	570.502(a)(7)]		
De	escribe Basis for Conclusion:		
b.	Are the schedule of expenditures of Federal awards presented fairly in all		
	material respects with relation to the financial statements of subrecipients taken as a whole?	Yes	No
	[OMB Circular A-133, §400(d)(4) and §500(b) and 24 CFR		
	570.502(a)(7)]		
D	escribe Basis for Conclusion:		
יינ	active dama ivi Culiciusivii.		

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32.			
	How does the program participant ensure that each subrecipient audit has determ whether the subrecipient has internal accounting and other control systems to programs on able assurance that it is managing Federal financial assistance programs in with applicable laws and regulations?	vide	iance
	Describe Basis for Conclusion:		
33.	Did the program participant review each audit report of its subrecipients that expended \$300,000 or more in Federal awards in the fiscal year [\$500,000 or more for fiscal years ending after December 31, 2003] to determine whether the audit report states the subrecipient has complied with the laws, regulations, and provisions of contracts or grant agreements that may have a direct and material effect on each of its major programs? [OMB Circular A-133, §320(a) and §500(d) and 24 CFR 570.502(a)(7)] Describe Basis for Conclusion:	Yes	No
34.	Did the program participant ensure that audit reports of its subrecipients that expended \$300,000 or more in Federal awards in the fiscal year [\$500,000 or	Yes	No
	more for fiscal years ending after December 21, 2003] were submitted within 30 days after receipt of the auditor's report, but not later than nine months after the end of the audit period (or such longer period agreed to in advance by the program participant)? [OMB Circular A-133, §320(a) and 24 CFR 570.502(a)(7)]		
	Describe Basis for Conclusion:		

35.		
How does the program participant ensure that audit costs are allowable as a dian allocated indirect cost, as determined in accordance with the applicable OM principles?		or as
[OMB Circular A-133, §400(d)(4) and §230 and 24 CFR 570.502(a)(7)]	
Describe Basis for Conclusion:	,,	
36.		
Does the program participant have a means for determining what corrective		
actions by the subrecipient are necessary and appropriate to resolve findings a	nd _{Yes}	No
that such actions are taken?		
[OMB Circular A-133, §400(d)(5) and 24 CFR 570.502(a)(7)]		
37.		
Does the system ensure that the program participant issues management		
decisions for audit findings within six months after receipt of subrecipient aud	103	No
reports, and provide follow-up to ensure that the subrecipient takes appropriate	*	
and timely corrective action?		
[OMB Circular A-133, §400(d)(5) and 24 CFR 570.502(a)(7)]		
Describe Basis for Conclusion:		

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Does the program participant have a means for deciding whether	r the	
subrecipient audit necessitates adjustment of the program partici	pant's records Yes	No
(concerning the subrecipient)?	103	140
[OMB Circular A-133, §400(d)(6) and 24 CFR 570.502(a)(7)1	
Describe Basis for Conclusion:	. / -	
Describe Dubis for Conclusion.		
)		
Did record review disclose any items that should have been adju-	sted in the	
program participant's records, but were not?	Yes	No
OMB Circular A-133, §400(d)(6) and 24 CFR 570.502(a)(140
Describe Basis for Conclusion:	,	
Describe Busis for Conclusion.		
).		
	andrea similaret to	
Does the program participant's system or procedure require each	·	
permit independent auditors and program participant staff to hav		No
records and financial statements, as necessary, to comply with th		
[OMB Circular A-133, §400(d)(7) and 24 CFR 570.502(a)(7)	7)]	
Describe Basis for Conclusion:	·	

41.			
	What is the program participant's process for reviewing and reaching determinati	ons to	
	accept or reject audit findings and properly documenting such determinations?		
	[24 CFR 570.502(a)(7)]		
	Describe Basis for Conclusion:		
42.			
4 ∠.	Does the program participant have a process for referral of agency (or	$\overline{}$	$\overline{\Box}$
	subrecipient)-contested findings and recommendations to senior level officials,	Ш	Ш
	outside of the normal chain of command, for resolution?	Yes	No
	[24 CFR 570.502(a)(7)]		
	Describe Basis for Conclusion:		
	Describe Busis for Conclusions		
43.			
	a. Does the program participant have a system or procedure to promptly inform		
	HUD and federal law enforcement authorities of illegal acts or	Yes	No
	irregularities?		
	[24 CFR 570.502(a)(7)]		
	Describe Basis for Conclusion:		
	b. If yes, what is the procedure(s)/criteria used in determining when to notify aut	horitie	s?
	Describe Basis for Conclusion:		

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44.			
	Is there a procedure to establish an account receivable from the subrecipient when a monetary sanction is involved?		
	when a monetary sanction is involved:	Yes	No
	Describe Basis for Conclusion:		
45.			
	Is there a means of ensuring consistent treatment of all audit findings?		
		Yes	No
	Describe Basis for Conclusion:		
46.			
	Does the program participant make positive efforts to use small businesses,		
	minority-owned firms, and women's business enterprises in procuring audit	∟ Yes	□ No
	services, and does its system encourage localities or subrecipients/subgrantees	res	NO
	to do the same? (Note : Because program participants are <u>not required</u> to use	Ì	
	minority-owned financial institutions, but encouraged to do so pursuant to OMB	Ì	
	Circular A-133, §305(a), a "No" response to this question would NOT	Ì	
	constitute a finding.)	Ì	
	[24 CFR 570.502(a)(5)] Describe Basis for Conclusion:		
	Describe Dasis for Conclusion.		

Based on the results of your review, does the program participant comply with		
its responsibility to establish and maintain a system for ensuring that its subrecipients comply with OMB Circular A-133?	Yes	No
Describe Basis for Conclusion Or Describe Deficiencies:		
Describe Busis for Conclusion of Bescribe Beneficiers.		

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Worksheet: Guide for Review of						
OMB Circular A-133 Audits Management System						
Name of Prog	ram Participant:					
Name(s) of		Date				
Reviewer(s)						

<u>Instructions</u>: This worksheet is intended to supplement the information contained in the Section <u>K. OMB Circular A-133</u>: Audits of States, Local Governments, and Non-Profit Organizations, of the Guide for Review of Financial Management. Where subrecipient audits are reviewed to confirm the implementation of the program participant's system, select a sample of grants and insert the names of the subrecipients in column (a) and the fiscal year end dates in column (b) of Part I. Insert due dates and receipt deadlines in columns (c) through (e) of Part I; and answer "yes" or "no," as appropriate, in columns (f) through (j) of Part II.

PART I - RECEIPT DEADLINES

	Subrecipient Name	Fiscal Year End Date	Audit Report Date	Audit Due Date	Audit Received Date
	(a)	(b)	(c)	(d)	(e)
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					
12.					

PART II - WERE REQUIREMENTS MET (YES/NO)?

	A-133 Met?	Corrective Actions Accepted?	Corrective Actions Documented?	Corrective Actions Taken?	Corrective Actions Taken in 6 months?
	(f)	(g)	(h)	(i)	(j)
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
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12					

PART III - CONCLUSIONS

Explain negative responses or delays in complying with the required deadlines.			
Describe Basis for C	onclusion:		

3-27 09/2005